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Under the American constitutional system, the exclusive power to make ordinary police regulations rests in the individual states. *United States v. Dewitt*, 9 Wall. (U. S.) 41; *Barbier v. Connolly*, 113 U. S. 27. The licensing of operators of motor vehicles using its highways is a proper exercise of police power by a state. *Hendrick v. Maryland*, 235 U. S. 610; *Ruggles v. State*, 120 Md. 553, 87 Atl. 1080. On the other hand the Constitution expressly gives Congress the power "to establish Post Offices and Post roads." CONSTITUTION, Art. I, § 8. And Congress has authorized the Postmaster to provide for the carrying of mail over state roads and highways. U. S. REV. STAT., § 3965; 1918 COMP. STAT., § 7458. Hence the principal case presents the problem of a conflict between state and federal authority. It has long been settled that a state cannot tax the instrumentalities of the federal government. *McCulloch v. Maryland*, 4 Wheat. (U. S.) 316. On the same principle it seems clear that a state cannot enforce against federal agencies a police regulation which in any degree impedes or clogs the functioning of the federal government. *Ohio v. Thomas*, 173 U. S. 276; *State v. Burton*, 41 R. I. 303, 103 Atl. 962. The majority of the court properly decided that the Maryland statute did impede the federal government. Cf. *Commonwealth v. Closson*, 229 Mass. 329, 118 N. E. 653.

**COVENANTS OF TITLE — COVENANT OF WARRANTY — EFFECT IN PREVENTING DESTRUCTION OF CONTINGENT REMAINDER BY MERGER.** — A, by deed containing a covenant of warranty, created a life estate in B, contingent remainder in fee in B's descendants who should survive him, reversion in fee in A. X purchased B's estate. Y purchased A's estate and conveyed it to X with intent to destroy the contingent remainder. X conveyed an undivided one-fifth interest to Z. In a suit for partition between X and Z, the children of B, who is still living, intervene, and claim that the contingent remainder was not destroyed. *Held*, that the remainder was not destroyed. *Biwer v. Martin*, 128 N. E. 518 (Ill.).

For a discussion of the principles involved in this case see NOTES, p. 431, *supra*.

**DAMAGES — MEASURE OF DAMAGES — FOREIGN CURRENCY — DATE AT WHICH RATE OF EXCHANGE SHOULD BE APPLIED.** — A contract was made for the purchase of English goods, delivery and payment to be made in Italy. At the date of the breach the rate of exchange was 31 lire to the pound. Judgment was rendered a year later, by which time the rate was 62 lire to the pound. *Held*, that damages will be computed at the rate of exchange prevailing at the time of the breach. *Di Ferdinando v. Simon, Smits & Co.*, [1920] 3 K. B. 409.

For the discussion of the principles involved in this case see NOTES, p. 422, *supra*.

**DIVORCE — DEFENSES — POSSIBILITY OF CONDONATION OF DESERTION.** — In October 1917, the plaintiff's husband deserted her. Later he returned and sought to resume the marital relation but she refused to do so until he proved his good intentions by behaving properly for three months, during which period she allowed him to live in her house. After a short time, the husband seriously misconducted himself, and the wife drove him from her house. He was subsequently guilty of adultery; and in November 1919, the wife sued for a divorce under a statute which required adultery and desertion for two years as a ground for divorce. (20-21 VICTORIA, c. 85, § 27.) *Held*, that the marriage be dissolved. *Moran v. Moran*, 52 D. L. R. 339.

The court departs from authority in allowing the desertion to relate back to 1917, but the result is desirable. Since divorce for desertion is allowed only after desertion has continued for the statutory period, courts say it is improper